

JOHN W. HUBER, United States Attorney (#7226)
MATTHEW L. BELL, Assistant United States Attorney (#9840)
Attorneys for the United States of America
20 North Main Street, Suite 208
Saint George, Utah 84770
Telephone: (435) 634-4270
Email: matthew.bell@usdoj.gov

FILED IN UNITED STATES DISTRICT
COURT, DISTRICT OF UTAH

SEP - 9 2015

D. MARK JONES, CLERK
BY _____
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL K. LINES,

Defendant.

INFORMATION

2:15-po-00524-RTB

COUNT I

36 C.F.R. § 4.23(a)(1)

OPERATING A VEHICLE UNDER THE
INFLUENCE OF ALCOHOL

COUNT II

36 C.F.R. § 4.23(a)(2)

BLOOD/ALCOHOL CONCENTRATION
GREATER THAN .08%

COUNT III

36 C.F.R. § 2.35(b)(2)

SIMPLE POSSESSION OF A CONTROLLED
SUBSTANCE

Judge Robert T. Braithwaite

The United States Attorney charges:

COUNT I

Class B Misdemeanor

On or about August 26, 2015, in the Central Division of the District of Utah, within
Zion National Park,

DANIEL K. LINES,

the defendant herein, was found to be operating a vehicle under the influence of alcohol as
described in the Statement of Probable Cause attached and incorporated as though set
forth fully herein; all in violation of 36 C.F.R. § 4.23(a)(1).

COUNT II

Class B Misdemeanor

On or about August 26, 2015, in the Central Division of the District of Utah, within
Zion National Park,

DANIEL K. LINES,

the defendant herein, was found to have a blood/alcohol concentration greater than .08%
as described in the Statement of Probable Cause attached and incorporated as though set
forth fully herein; all in violation of 36 C.F.R. § 4.23(a)(2).

COUNT III

Class B Misdemeanor

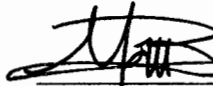
On or about August 26, 2015, in the Central Division of the District of Utah, within
Zion National Park,

DANIEL K. LINES,

the defendant herein, did knowing possession a controlled substance (to wit: marijuana), as described in the Statement of Probable Cause attached and incorporated as though set forth fully herein; all in violation of 36 C.F.R. § 2.35(b)(2).

DATED this 9th day of September, 2015.

JOHN W. HUBER
United States Attorney



MATTHEW L. BELL
Assistant United States Attorney

STATEMENT OF PROBABLE CAUSE

(For issuance of an arrest warrant or summons)

I state that on August 26, 2015 while exercising my duties as a law enforcement officer in the District of Utah at approximately 23:10 hours I was on foot with US Park Ranger Travis Heinrich near the Zion Lodge Employee dorms when a white Ford Explorer with Utah registration D138WG drove by us headed towards the lodge cabins. As it passed, Heinrich and I detected the scent of burnt marijuana coming from the open driver's side window. I followed the vehicle on foot and saw it park in front of the lodge cabins. The driver exited the vehicle and I contacted him. About this time, Heinrich arrived in the patrol vehicle. The driver's eyes appeared bloodshot and glassy. I detected the scent of an alcoholic beverage on his breath. I asked the driver if he had been smoking marijuana. He stated he had around noon. I then asked if he had been drinking. He stated he had consumed 3 beers in the past 2 hours. I identified the driver as Daniel K LINES by his CA DL. I told LINES I wanted to do field sobriety tests, which he agreed to. During the Horizontal Gaze Nystagmus phase, I observed 6 of 6 clues indicating impairment. I observed 3 of 8 clues during the Walk and Turn phase and 2 of 4 clues during the One Leg Stand. I arrested LINES for suspicion of operating a motor vehicle under the influence of alcohol. I wrote LINES violation notice #4685886 under 36 CFR 4.23(a)(1): operating a motor vehicle under the influence of alcohol.

The foregoing statement is based upon:

- ☒ my personal observation ☒ my personal investigation
☒ information supplied to me from my fellow officer's observation
☐ other (explain above)

I declare under penalty of perjury that the information which I have set forth above and on the face of this violation notice is true and correct to the best of my knowledge.

Executed on: 08/26/2015
 Date (mm/dd/yyyy)

AA 1251
 Officer's Signature

Probable cause has been stated for the issuance of a warrant.

Executed on: _____
 Date (mm/dd/yyyy) U.S. Magistrate Judge

STATEMENT OF PROBABLE CAUSE
(For issuance of an arrest warrant or summons)

I state that on August 26, 2015 while exercising my duties as a law enforcement officer in the District of Utah at approximately 23:10 hours I was on foot with US Park Ranger Travis Heinrich near the Zion Lodge Employee dorms when a white Ford Explorer with Utah registration D138WG drove by us headed towards the lodge cabins. As it passed, Heinrich and I detected the scent of burnt marijuana coming from the open driver's side window. I followed the vehicle on foot and saw it park in front of the lodge cabins. The driver exited the vehicle and I contacted him. About this time, Heinrich arrived in the patrol vehicle. The driver's eyes appeared bloodshot and glassy. I detected the scent of an alcoholic beverage on his breath. I asked the driver if he had been smoking marijuana. He stated he had around noon. I then asked if he had been drinking. He stated he had consumed 3 beers in the past 2 hours. I identified the driver as Daniel K LINES by his CA DL. I told LINES I wanted to do field sobriety tests, which he agreed to. During the Horizontal Gaze Nystagmus phase, I observed 6 of 6 clues indicating impairment. I observed 3 of 8 clues during the Walk and Turn phase and 2 of 4 clues during the One Leg Stand. I arrested LINES for suspicion of operating a motor vehicle under the influence of alcohol. LINES provided a breath sample for the Intoxilizer 8000 that indicated a BAC of 0.080 approximately one hour after our initial contact. I wrote LINES violation notice #4685887 under 36 CFR 4.23(a)(2): operating a motor vehicle under the influence of alcohol.

The foregoing statement is based upon:

- ☒ my personal observation ☒ my personal investigation
☒ information supplied to me from my fellow officer's observation
☐ other (explain above)

I declare under penalty of perjury that the information which I have set forth above and on the face of this violation notice is true and correct to the best of my knowledge.

Executed on:

08/26/2015
Date (mm/dd/yyyy)

[Signature]
Officer's Signature

Probable cause has been stated for the issuance of a warrant.

STATEMENT OF PROBABLE CAUSE

(For issuance of an arrest warrant or summons)

I state that on August 26, 2015 while exercising my duties as a law enforcement officer in the District of Utah at approximately 23:10 hours I was on foot with US Park Ranger Travis Heinrich near the Zion Lodge Employee dorms when a white Ford Explorer with Utah registration D138WG drove by us headed towards the lodge cabins. As it passed, Heinrich and I detected the scent of burnt marijuana coming from the open driver's side window. I followed the vehicle on foot and saw it park in front of the lodge cabins. The driver exited the vehicle and I contacted him. About this time, Heinrich arrived in the patrol vehicle. The driver's eyes appeared bloodshot and glassy. I asked the driver if he had been smoking marijuana. He stated he had smoked in his around noon and that the pipe was still in the vehicle. He denied smoking on the lodge property as he was a lodge employee. Heinrich searched the LINE's vehicle, finding a green glass pipe with burnt marijuana in it as well as a black plastic jar with trace amounts of unburnt marijuana in it. The label on the jar said "The Green Solution" and stated the jar contained marijuana. I wrote LINES violation notice #4685889 under 36 CFR 2.35 (b)(2): possession of a controlled substance.

The foregoing statement is based upon:

- ☒ my personal observation ☒ my personal investigation
☒ information supplied to me from my fellow officer's observation
☐ other (explain above)

I declare under penalty of perjury that the information which I have set forth above and on the face of this violation notice is true and correct to the best of my knowledge.

Executed on:

08/26/2015
Date (mm/dd/yyyy)

[Signature]
Officer's Signature

Probable cause has been stated for the issuance of a warrant.

Executed on:

Date (mm/dd/yyyy)

U.S. Magistrate Judge